

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

JESUS GONZALEZ, *an individual*,

Plaintiff,

CASE NO.: 1:24-cv-21889-RKA

vs.

FARMACIA 22-24 CENTRO, INC.,  
*a Florida corporation, and DOLORES M LLC, a*  
*Florida limited liability company,*

Defendants.

/

**PLAINTIFF'S VERIFIED AFFIDAVIT REGARDING PLAINTIFF'S  
PAST VISITS TO THE PROPERTY**

Plaintiff, JESUS GONZALEZ ("Plaintiff"), by and through his undersigned counsel, hereby files his Verified Affidavit Regarding Plaintiff's Past Visits to the Property, and in support thereof would state:

**1. Plaintiff's past visits to the subject property**

I visited subject property on May 9, 2024.

**2. Any specific plans to return to the property in the future**

I live in Coral Gables, Florida, which is fairly near the subject property. I will return to the subject property after all of the ADA violations have been remediated.

**3. Specific details relating to the frequency of travel to the area**

I live in Coral Gables, Florida, which is fairly near the subject property. I am in the area very frequently.

**4. Plaintiff's specific proximity to the property**

My home is approximately 4.6 miles from the subject property.

## VERIFICATION

Pursuant to 28 U.S.C. § 1746 I verify under penalty of perjury that the foregoing is true and correct.

DocuSigned by:  
  
AF11C7979E974A5  
JESUS GONZALEZ, PLAINTIFF

Respectfully Submitted,

**LAW OFFICES OF NOLAN KLEIN**  
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By: /s/ Nolan Klein  
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and

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By: /s/ Joshua M. Entin  
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## CERTIFICATE OF SERVICE

**I HEREBY CERTIFY** that a copy of the foregoing instrument was e-filed with the Clerk of the Court using CM/ECF, this **30th** day of **May**, 2024.

By: /s/ Nolan Klein  
NOLAN KLEIN, ESQ.